LOUISVILLE - JEFFERSON COUNTY METRO GOVERNMENT
AIR POLLUTION CONTROL DISTRICT
850 Barret Ave., Louisville, Kentucky 40204
31 August 2006

TITLE V PERMIT SUMMARY

Company: American Synthetic Rubber Company, LLC

Plant Location: 4500 Camp Ground Road, Louisville, Kentucky 40216

Date App. Received: 18 April 1997 **Date Admin. Complete:** 12 May 1997

Date of Draft Permit: 04 September 2005 **Date of Proposed Permit:** 22 December 2005

District Engineer: Stephen Taylor **Permit No.:** 154-97-TV (R1)

Plant ID: 0011 **SIC Code:** 2822 **NAICS:** 325212 **AFS:** 00011

Introduction:

This permit will be issued pursuant to: (1) Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide methods of determining continued compliance with these requirements.

Jefferson County is classified as an attainment area for lead (Pb), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), carbon monoxide (CO), and particulate matter less than 10 microns (PM_{10}); and is a non-attainment area for particulate matter less than 2.5 microns ($PM_{2.5}$) and basic non-attainment area for 8-hr ozone (O_3).

Application Type/Permit Activity:

[X] Initial Issuance
[ ] Permit Revision
- [ ]Administrative
- [ ]Minor
- [ ]Significant

[ ] Permit Renewal

Compliance Summary:

[X] Compliance certification signed [ ] Compliance schedule included
[ ] Source is out of compliance

I. Source Description

1. Class I Area Impacts: This source is not located in or near a Class I area.

2. Product Description: The source produces polybutadiene rubber (PBR) and styrene butadiene rubber (SSBR) by solution, and liquid polymer (LP).

3. Overall Process Description: Through a continuous operation, the source reacts monomers using a solvent as a chain transfer agent, to produce SSBR and PBR crumb rubber. The crumb rubber is then compressed and baled prior to shipping. Liquid polymer is produced in a batch operation. The source produces steam for plant-wide use with coal- and gas-fired boilers.

4. Site Determination: There are no other facilities that are contiguous or adjacent and under common control.

5. Emission Unit Summary:

a. **U1/U2 Synthetic Rubber Production:** This production unit, which manufactures polybutadiene (PBR) and solution styrene butadiene rubber (SSBR), is subject to 40 CFR 63 Subpart U.

b. **U3 Liquid Polymer Production:** This production unit, which manufactures butadiene-acrylic acid-acrylonitrile terpolymer, is not subject to 40 CFR 63 Subpart U.

c. **U4 Power House:** Two coal fired and two natural gas fired boilers and related equipment.

d. **UMSC Miscellaneous:** Gasoline fueling and cold solvent parts washers

6. Fugitive Sources: Fugitive emissions of dust from any part of the plant are subject to Regulation 1.14, *Control of Fugitive Particulate Emissions*. VOC HAP emissions from component leaks defined in the Polymers and Resins Group I MACT are monitored by the leak detection and repair procedures outlined in 40 CFR 63 Subpart U.

7. Permit Revisions:

Revision No.	Date of Reissuance	Public Notice Date	Type	Emission Unit/Page No.	Description
Initial	8/31/2006	09/04/2005	Initial	Entire Permit	Entire Permit

Revision No.	Date of Reissuance	Public Notice Date	Type	Emission Unit/Page No.	Description
R1	8/31/2006	N/A	Admin	Cover Page	Changed the Responsible Official

8. Title V Major Source Status by Pollutant:

Pollutant	Actual Emissions 2003 Data (tpy)	Major Source Status (based on PTE)
CO	290.52	Yes
NO_X	635.48	Yes
SO_2	158.96	Yes
PM	9.07	Yes
VOC	448.33	Yes
Single HAP		
Acrylic Acid	0.65	No
Acrylonitrile	0.65	No
1, 3-Butadiene	60.14	Yes
Toluene	317.14	Yes
Styrene	24.08	Yes
Hydrogen Chloride	9.0	Yes
Hydrogen Fluoride	1.12	No
Total HAPs	388.7	Yes

9. MACT Standards: This source is major for HAPs and is subject to or may be subject in the future to the following MACT regulations:

40 CFR 63 Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins
40 CFR 63 Subpart FFFF	National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing

40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

10. Applicable Requirements:

[X] PSD	[X] NSPS	[X] SIP	[ ] Other
[X] NSR	[ ] NESHAPS	[X] District-Origin	[X] MACT

The District has reviewed all construction, reconstruction, and modifications to determine PSD/Non-attainment NSR applicability to this source. There have been four construction, reconstruction, or modification projects that triggered the significant levels listed in Regulation 2.04, *Construction or Modification of Major Sources in or Impacting upon Non-Attainment Areas (Emission Offset Requirements)*, and Regulation 2.05, *Prevention of Significant Deterioration of Air Quality*. The source "netted out" for three projects (#1 Line installation, #4 Line installation, and #5 Line installation). The source has been issued PSD permits for the boiler installation project.

11. Referenced Federal Regulations in Permit:

40 CFR 60 Subpart A	General Provisions
40 CFR 60 Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
40 CFR 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 CFR 63 Subpart A	General Provisions
40 CFR 63 Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins
40 CFR 68 Subparts A through H	Chemical Accident Prevention Provisions

II. Regulatory Analysis

1. Emission and Operating Caps: The source has no plantwide emission or operating caps.

2. Compliance Status: The source signed and submitted a Title V compliance certification in its permit application.

3. Operational Flexibility: The source did request to operate under alternative operating scenarios in its Title V Permit Application for raw materials use and equipment flexibility use; however, the District has determined these do not fit the definition of an Alternative Operating Scenario, an option by which a company has defined a *specific*, alternative mode of operation.

4. **Testing Requirements:** Relative Accuracy Test Audit (RATA) and Cylinder Gas Audit (CGA) testing are required for the CEMS. For Boiler #1 and Boiler #2, the owner or operator shall conduct a Method 5 performance test for PM within the first two years of the permit issuance. The owner or operator shall conduct an annual performance test for NO_x for each of Boiler #3 and Boiler #4. If the requirements of Regulation 6.42 *Reasonably Available Control Technology Requirements for Major Volatile Organic Compound- and Nitrogen Oxides-Emitting Facilities* section 5.1 are met, and subject to the annual performance test schedule reinstitution provision, performance testing may be done on a biennial schedule.

5. **Monitoring, Record Keeping and Reporting Requirements:** The source is required to monitor, maintain records of, and report on various operating parameters to demonstrate compliance with all applicable requirements. Compliance reporting is required semi-annually, except where underlying applicable regulations or permit conditions require more frequent reporting.

a. **Opacity**

Emission Unit U1/U2

For Emission Points (BU-1T and Heat Cleaning Oven),

i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation and daylight hours, of the emission points/stacks. No more than four emission points/stacks shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.

ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.

iii. The owner or operator shall maintain records of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date and time of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

Emission Unit U4

i. For Boiler #1 and Boiler #2, the owner or operator shall operate and maintain a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere and record the output of the system.

ii. For Boiler #3 and Boiler #4, when combusting natural gas:

1) The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation and daylight hours, of the PM emission points/stack (S-U4-BLR3/4). No more than four emission points/stacks shall be observed simultaneously.

2) At emission points/stacks where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 within 24 hours of the initial observation.

iii. For Boiler #4, when combusting fuel oil:

1) The owner or operator shall conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM emission points/stack (S-U4-BLR3/4). No more than four emission points/stacks shall be observed simultaneously.

2) At emission points/stacks where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 within 24 hours of the initial observation.

iv. For each Emission Point (Ash Handling System, Ash Load-Out System, Lime Handling System, and Coal Handling System), when each is operating,

1) The owner or operator shall conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM emission points/stacks or the nearest opening in the enclosure for the Ash Load-Out System. No more than four emission points/stacks/openings shall be observed simultaneously.

2) At emission points/stacks/openings where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 within 24 hours of the initial observation.

v. For Emission Point (Truck Lime Unloading), this Emission Point is a closed system, and there are no Opacity compliance monitoring requirements for Regulation 7.08.

vi. The owner or operator shall maintain records of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date and time of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

b. **PM**

Emission Unit U1/U2

i. For Emission Point (BU-1T), the owner or operator shall perform the following for the associated fabric filter (C-U1/U2-DC-1T)

1) Perform a visual inspection, two times per year, of the structural and mechanical integrity (i.e. for signs of damage, air leakage, corrosion, etc.) on the external part of the unit and repair as needed.

2) Perform a visual inspection, two times per year, of the filter media for deterioration and replace or repair as needed.

ii. For Emission Point (Heat Cleaning Oven), the owner or operator submitted a one time PM compliance demonstration on July 25, 2003 showing that the potential uncontrolled PM hourly emissions are less than the standard in Regulation 7.08. Therefore, there are no monitoring, recordkeeping, or reporting requirements for this standard. (Construction Permit 246-01-C, dated September 30, 2002)

Emission Unit U4

i. For Boiler #1 and Boiler #2, when combusting coal, the owner or operator shall conduct a Method 5 performance test for PM within

the first two years of the permit issuance. The source performed an EPA Reference Method 5 performance test for PM emissions from Boiler #1 and Boiler #2 on December 3, 1992. The performance test demonstrated the PM emissions are 2.13 lb/hr and 0.007 lb/MMBtu from each boiler, which are in compliance with the PSD limits.

ii. For Boiler #3 and Boiler #4, when combusting either natural gas or fuel oil, the owner or operator submitted a one-time compliance demonstration on March 10, 2004, showing that the potential PM emissions do not exceed the standards. Therefore, there are no PM compliance monitoring, recordkeeping, or reporting requirements for these boilers.

iii. For the fabric filters (C-U4-ASHSILO, C-U4-ASHLOAD, C-U4-LIMESILO, and C-U4-COALSILO) controlling respective Emission Points (Ash Handling System, Ash Load-Out System, Lime Handling System, and Coal Handling System), the owner or operator shall keep a record of the inspections and visual checks performed in accordance with Additional Condition 2.c.iii.

iv. For Emission Point (Truck Lime Unloading), this Emission Point is a closed system, and there is no PM compliance recordkeeping requirement for Regulation 7.08.

c. **VOC/HAP**

Emission Unit U1/U2

i. For Storage Vessels (T-2, T-2A, T-2B, T-2C, T-3, T-4, T-4A, T-4B, T-4C, and T-1),

1) For Storage Vessels (T-2 (when venting directly to the Flare Thermal Oxidizer (C-FLARE TO) and/or the Flare Control System (C-FLARE)), T-2A, T-2B, T-2C, T-3, T-4, T-4A, T-4B and T-4C), the owner or operator shall keep a record of the times the Flare Thermal Oxidizer (C-FLARE TO) and/or the Flare Control System (C-FLARE) are not in operation and venting to the atmosphere of any of these Emission Points occurs, that are, at the time, storing VOCs with a true vapor pressure equal to or greater than 1.5 psia (*i.e.*, times true vapor pressure of tank contents is equal to or greater than 1.5 psia and emissions are not controlled by the Flare Thermal Oxidizer and/or the Flare Control System).

2) For Storage Vessels (T-2 (when not venting directly to the Flare Thermal Oxidizer (C-FLARE TO) and/or the Flare Control System (C-FLARE) and T-1), the owner or operator

shall maintain a list of the materials that are stored in the vessel(s) and the corresponding vapor pressure. If the contents of the storage vessels are changed to a material not on the list, then a record shall be made of the new contents in order to demonstrate compliance with Additional Condition 1.d.i. These records shall be maintained for at least 5 years and be made available to the District upon request.

ii. For Storage Vessels (T-15M, T-15T, T-32, Day Tank 2, Day Tank 3, Day Tank 4, Day Tank 5, Day Tank 6, T-11M, T-12M, T-13M, T-13T, T-14, D-3, and Z-1),

1) For Storage Vessels (T-15M, T-15T, T-32, Day Tank 2, Day Tank 3, Day Tank 4, Day Tank 5, Day Tank 6, T-11M, T-12M, T-13M, T-13T, T-14, and D-3), there are no VOC compliance recordkeeping requirements for these Emission Points.

2) For Storage Vessel (Z-1), the owner or operator shall maintain a list of the materials that are stored in the vessel and the corresponding vapor pressure. If the contents of the storage vessel are changed to a material not on the list, then a record shall be made of the new contents in order to demonstrate compliance with Additional Condition 1.d.ii. These records shall be maintained for at least 5 years and be made available to the District upon request.

iii. For Emission Points (Truck Staining Oil Loading/Unloading (when loading), Railcar Staining Oil Loading/Unloading (when loading), Railcar Loading and Railcar Solvent Loading),

1) When loading more than 200 gallons but less than 20,000 gallons of volatile organic material (VOM) in any one day, there are no VOC compliance recordkeeping requirements for these Emission Points because all of the Emission Points are submerged fill/bottom loaded.

2) When loading 20,000 gallons or more of volatile organic materials (VOM) in any one day,

a) For Emission Points (Truck Staining Oil Loading/Unloading (when loading), Railcar Staining Oil Loading/Unloading (when loading), Railcar Loading (when being operated as a closed system) and Railcar Solvent Loading (when being operated as a closed system)), each of which is a closed system, there are no VOC compliance recordkeeping

requirements because these Emission Points do not have a vent to the atmosphere.

b) For Emission Point (Railcar Loading), when not being operated as a closed system and is being vented to the Flare Thermal Oxidizer (C-FLARE TO) and/or Flare Control System (C-FLARE), the owner or operator shall keep a record of the times the Flare Thermal Oxidizer (C-FLARE TO) and/or the Flare Control System (C-FLARE) are not in operation while this Emission Point is loading more than 20,000 gallons a day of VOMs and not being operated as a Closed System.

c) For Emission Point (Railcar Solvent Loading), when not being operated as a closed system, the owner or operator shall maintain a list of the materials that are loaded and the corresponding true vapor pressure under actual storage conditions. If a material is changed to a material not on the list, then a record shall be made of the new material and its true vapor pressure under actual storage conditions in order to demonstrate compliance with Additional Condition 1.d.iii.2)c).

iv. For Emission Points (Truck Staining Oil Loading/Unloading (when unloading), Truck Chemical Addition Materials Unloading, General Tank Farm Railcar Unloading, Railcar Staining Oil Loading/Unloading (when unloading), Railcar Chemical Addition Materials Unloading, X-2, D-32, D-15, C-7, D-9, D-13, C-1, D-10, D-17, D-18, D-1, Z-2, D-39, D-7, D-5, D-38A, D-38B, D-6, D-8, Reactor 1 through Reactor 13, D-24, D-25, D-26, D-27, D-28, D-29, T-5A, T-5B, T-5C, T-5D, T-5E, No. 1 Stripper Vessels, and No. 2 Stripper Vessels),

1) For Emission Points (D-32, D-15, D-18, D-7, D-28, D-29, T-5A, T-5B, T-5C, T-5D, and T-5E), the owner or operator shall keep a record of all the times the Flare Thermal Oxidizer (C-FLARE TO) and/or the Flare Control System (C-FLARE) is not in operation and venting of any of these Emission Points occurs (*i.e.*, times emissions occur and are not controlled by the Flare Thermal Oxidizer and/or the Flare Control System). During these occurrences the owner or operator shall monthly calculate the lb/hr and lb/day VOC emissions for each Emission Point.

2) For Emission Points (D-13, D-1, Z-2, D-39, D-5, D-38A, D-38B, D-6, and D-8), all of which are subject to Regulation 6.24 and are not vented to the Flare Thermal Oxidizer (C-FLARE-TO) and/or the Flare Control System (C-FLARE), the owner or operator submitted a one-time VOC compliance demonstration on July 25, 2003, which showed that the uncontrolled maximum VOC emissions at each emission point do not exceed the regulatory requirements of Regulation 6.24. Therefore there are no VOC monitoring, recordkeeping, or reporting requirements for these emission points. For the puposes of the compliance demonstrations, all Class II and Class III VOC mixtures were assumed to be Class II, which are the more stringent regulatory limits.

3) For Emission Points (Truck Staining Oil Loading/Unloading (when unloading), Truck Chemical Addition Materials Unloading, General Tank Farm Railcar Unloading, Railcar Staining Oil Loading/Unloading (when unloading), Railcar Chemical Addition Materials Unloading, X-2, C-7, D-9, C-1, D-10, D-17, Reactor 1 through Reactor 13, D-24, D-25, D-26, D-27, No. 1 Stripper Vessels, and No. 2 Stripper Vessels), there are no VOC recordkeeping requirements since these emission points are closed or closed pressurized systems that do not have a vent to the atmosphere.

v. For Emission Points (No. 1 Line, No. 2 Line, No. 3 Line, No. 4 Line and No. 5 Line), the owner or operator shall maintain the following records for all periods of operation of the Finishing Building:

1) An identification of the control device, i.e., the specific coal-fired boiler or the Regenerative Thermal Oxidizer RTO-1, to which the exhaust gases from the Finishing Building were ducted; and (Regulation 6.43, section 7.3.1)

2) Identification of all time periods for which the exhaust gases from the Finishing Building by-passes either control (C-U1/U2-BLR-1/2 and C-U1/U2-RTO-1).

3) An indicator, approved in writing by the District, of proper operation of the control device. (See Comment 19)

4) The average monthly calculated overall control efficiency (capture and control).

vi. For Emission Points (General Tank Farm Truck Unloading, X-2M, C-2M, D-16M, C-2, D-16, X-2T, C-2T, D-16T, D-59M, C-1A, D-10A, C-1T, D-10T, D-17T, D-18T, C-9M, D-44, D-44M, D-45M, D-

7M, D-5M, D-56M, D-57M, D-8M, D-19M, D-20M, D-69M, D-68M, D-155M, D-60M, D-61M, D-67M, D-66M, Reactor 14, D-24M, D-24T, D-25M, D-26M, D-28M, D-25T, D-26T, D-28T, D-64M, T-5F, T-5G, T-5H, T-5J, T-5K, No. 3 Stripper Vessels, No. 4 Stripper Vessels, No. 5 Stripper Vessels, D-30, D-30M, D-30T, T-9A, T-9B, T-9C, T-9D, T-9E/T, No. 1 Line, No. 2 Line, No. 3 Line, No. 4 Line, No. 5 Line, and Heat Cleaning Oven),

1) For Emission Points (D-16M, D-16, D-16T, D-59M, D-10T (when not operating as a closed system and venting directly to the Flare Thermal Oxidizer (C-FLARE TO) and/or the Flare Control System (C-FLARE)), D-18T, C-9M, D-7M, D-5M, D-56M, D-57M, D-8M, D-19M, D-20M, D-69M, D-68M, D-155M, D-60M, D-61M, D-67M, D-66M, D-28M, D-28T, D-64M, T-5F, T-5G, T-5H, T-5J, and T-5K), the owner or operator shall keep a record of the times the Flare Thermal Oxidizer (C-FLARE TO) and/or the Flare Control System (C-FLARE) is not in operation and venting of any of these Emission Points occurs (*i.e.*, times emissions occur and are not controlled by the Flare Thermal Oxidizer and/or the Flare Control System).

2) For Emission Points (D-30, D-30M, D-30T, No. 1 Line, No. 2 Line, No. 3 Line, No. 4 Line, and No. 5 Line), the owner or operator shall keep a record of all times stripping technology was not in operation or was by-passed, while the Finishing Lines were operating, such that VOC BACT was not in place.

3) For Emission Points (D-44, D-44M, and D-45M), the potential uncontrolled combined VOC emissions are less than 1 ton per year. Therefore there are no VOC recordkeeping requirements to meet the less than 1 ton per year standard.

4) For Emission Point (Heat Cleaning Oven),

   a) The uncontrolled potential VOC emissions are less than 1 ton per year, therefore there are no monitoring requirements to meet the standard.

   b) When the emission point is in operation, the owner or operator shall maintain records of the average batch cycle oxidizing or afterburner chamber temperature for each batch cycle. (Construction Permit 246-01-C, dated September 30, 2002)

5) For Emission Points (General Tank Farm Truck Unloading, X-2M, C-2M, C-2, X-2T, C-2T, C-1A, D-10A, C-1T, D-10T

(when operating as a closed system and not venting directly to the Flare Thermal Oxidizer (C-FLARE TO) and/or the Flare Control System (C-FLARE)), D-17T, Reactor 14, D-24M, D-24T, D-25M, D-26M, D-25T, D-26T, No. 3 Stripper Vessels, No. 4 Stripper Vessels, No. 5 Stripper Vessels, T-9A, T-9B, T-9C, T-9D, and T-9E/T), there are no recordkeeping requirements since these emission points are closed or closed pressurized systems that do not have a vent to the atmosphere.

vii. For Emission Points (No. 1 Line, No. 4 Line, and No. 5 Line), the owner or operator shall monthly calculate and record the monthly and 12 consecutive month VOC emissions from each Finishing Line (No. 1 Line, No. 4 Line, and No. 5 Line) in order to demonstrate compliance with Additional Condition 1.d.vii. (Construction Permit # 23-88-C, dated March 16, 1988; Construction Permit # 116-89-C, dated May 1, 1989; Banking Permit 168-94-B, dated April 1, 1994; Construction Permit # 354-94-C, dated June 1, 1994; Construction Permit # 58-95-C, dated March 10, 1995)

viii. For U1/U2 VOC Emission Points, for any given day when operating, the owner or operator shall maintain the following records and monthly calculate daily VOC emissions by the formulas contained in Additional Condition 2.d.ix. If not operating on a given day, a negitive declaration may be entered into the appropriate record. (Regulation 1.05, section 4)

1) Daily production (pounds)
2) Monthly daily average inlet to front-end control device (Flare Thermal Oxidizer and/or Flare Control System)
3) Daily adjusted residual VOC
4) Monthly average bale residual VOC
5) Daily applicable control efficiencies (Flare Thermal Oxidizer and/or Flare Control System, and Boiler(s) or Regenerative Thermal Oxidizer RTO-1)
6) Monthly daily average solvent consumption
7) Daily average solvent in wastewater

ix. For Emission Points (No. 1 Line, No. 2 Line, No. 3 Line, No. 4 Line, and No. 5 Line), the owner or operator shall maintain records of the following: (Construction Permit 354-94-C, dated June 1, 1994; and Construction Permit 58-95-C, dated March 10, 1995)

1) Number of times each month the VOC vent stream controlled by either C-U1/U2-BLR1/2 or C-U1/U2-RTO-1 by-passes both control devices and is vented to the atmosphere;

2) Duration of each by-pass; and

3) Calculated quantity of tons of VOC emitted for each by-pass.

Emission Unit U3

x. For Storage Vessels (T-5, AA-101, AA-102, AA-103, and T-71), there are no VOC compliance recordkeeping requirements for these Emission Points. (See Comments 2 and 3)

xi. For Emission Points (Truck Loading/Unloading (when unloading), T-6L, D-49LA, DR-1, R-2, R-3, R-4, R-5, R-6, DDM-2, DDM-4, DDM-5, DDM-6, D-3, D-53L, and D-6),

1) For Emission Point (D-3), the owner or operator shall keep a record of the times the Flare Thermal Oxidizer (C-FLARE TO) and/or the Flare Control System (C-FLARE) are not in operation and venting to the atmosphere of this Emission Point occurs such that the VOC emissions exceed the Regulation 6.24 hourly and/or daily limits (*i.e.*, times VOC emissions occur in excess of the Regulation 6.24 limit and are not controlled by the Flare Thermal Oxidizer and/or the Flare Control System).

2) For Emission Points (Truck Loading/Unloading (when unloading) and D-53L), there are no VOC compliance monitoring requirements for these Emission Points. (See Comment 5)

3) For Emission Points (T-6L, D-49LA, DR-1, R-2, R-3, R-4, R-5, R-6, DDM-2, DDM-4, DDM-5, DDM-6, and D-6), these Emission Points are closed, or closed pressurized, systems and do not have a vent to the atmosphere. Thus there are no VOC compliance recordkeeping requirements for Regulation 6.24.

xii. For Emission Points (General Tank Farm Truck Loading/Unloading (when loading), Truck Loading/Unloading (when loading), and Railcar Loading/Unloading (when loading)),

1) When loading more than 200 gallons but less than 20,000 gallons of volatile organic material (VOM) in any one day, there are no VOC compliance recordkeeping requirements for these Emission Points because all of the Emission Points are submerged fill/bottom loaded.

2) When loading 20,000 gallons or more of volatile organic materials (VOM) in any one day,

a) For Emission Points (General Tank Farm Truck Loading/Unloading (when loading), Truck Loading/Unloading (when loading and being operated as a closed system) and Railcar Loading/Unloading (when loading)), each of which is a closed system, there are no VOC compliance recordkeeping requirements because these Emission Points do not have a vent to the atmosphere.

b) For Emission Point (Truck Loading/Unloading (when loading and not being operated as a closed system)), the owner or operator shall maintain a list of the materials that are loaded and the corresponding true vapor pressure under actual storage conditions. If a material is changed to a material not on the list, then a record shall be made of the new material and its true vapor pressure under actual storage conditions in order to demonstrate compliance with Additional Condition 1.c.iii.2)b).

xiii. For Emission Points (General Tank Farm Truck Loading/Unloading (when unloading), Railcar Loading/Unloading (when unloading), D-49LB, DR-2, DR-3, and T-1L) and Emission Point System consisting of [T-3(LP), T-2(LP), C-1(LP), T-1(LP)],

1) For Emission Point (T-1L) and the Emission Point System consisting of [T-3(LP), T-2(LP), C-1(LP), T-1(LP)], the owner or operator shall keep a record of the times the Flare Thermal Oxidizer (C-FLARE TO) and/or the Flare Control System (C-FLARE) are not in operation and venting to the atmosphere of any of these Emission Points occurs (*i.e.*, times emissions occur and are not controlled by the Flare Thermal Oxidizer and/or the Flare Control System).

2) For Emission Points (General Tank Farm Truck Loading/Unloading (when unloading), Railcar Loading/Unloading (when unloading), D-49LB, DR-2, and DR-3), these Emission Points are closed, or closed pressurized, systems and do not have a vent to the atmosphere. Thus there are no VOC compliance recordkeeping requirements for Regulation 7.25.

xiv. For the Flare Thermal Oxidizer (C-FLARE TO) and the Flare Control System (C-FLARE), the owner or operator shall comply with the

following requirements when VOC emissions from Emission Points (D-3 and T-1L) and Emission Point System consisting of [T-3(LP), T-2(LP), C-1(LP), T-1(LP)] are being operated and are venting to either control device. (See Additional Condition 3.a.)

1) For the Flare Thermal Oxidizer (C-FLARE TO) and/or Flare Control System (C-FLARE), when VOC emissions are being vented to it, see Additional Condition 3.a.

2) For the Flare Control System, when VOC emissions are being vented to it;

a) The owner or operator shall maintain a record of the date and time when the flare pilot flame went out, and the date and time that the flare pilot flame was reignited, whenever U3 process venting to the Flare Control System (C-FLARE) occurs during this outage time.

b) The owner or operator shall keep a record of each visible emission test (Method 22).

c) The owner or operator shall obtain a sample of the gas going to the Flare Control System within 24 hours and the flow of gas going to the Flare Control System if the flame is extinguished for any reason and U3 process venting to the Flare Control System (C-FLARE) occurs during this outage time.

xv. For U3 VOC Emission Points, the owner or operator shall maintain the following records and monthly calculate daily VOC emissions by the formula contained in Additional Condition 2.c.vi. If U3 batch charging did not occur on a given day, a negative declaration may be entered into the appropriate records. (Regulation 1.05, section 4)

1) Daily pounds of production

2) Average daily pounds of VOC recovered

3) Daily applicable control efficiency (Flare Thermal Oxidizer and/or Flare Control System)

Emission Unit U4

xvi. For Boiler #1 and Boiler #2, when combusting coal, and Boiler #4, when combusting fuel oil, the owner or operator submitted a one-time compliance demonstration dated March 10, 2004 showing that the

potential VOC emissions do not exceed the standards. Therefore, there are no VOC compliance monitoring, recordkeeping, or reporting requirements for these boilers.

xvii. For Boiler #3 and Boiler #4, when combusting natural gas, the owner or operator submitted performance test results on April 30, 2004, showing that the VOC emissions do not exceed the standards. Therefore, there are no VOC compliance monitoring, recordkeeping, or reporting requirements for these boilers.

xviii. For Emission Point (Truck Fuel Oil Loading/Unloading), the owner or operator shall maintain the MSDS for the material loaded/unloaded in order to demonstrate that the vapor pressure is less than 1.5 psia.

Emission Unit UMSC

xix. For Emission Point Gasoline Tank, the owner or operator shall keep a record of the amount of throughput of gasoline per month.

xx. For Emission Point Parts Washers, the owner or operator shall conduct monthly inspections to verify compliance with the control and operational requirements and keep a record of the findings.

xxi. For Emission Point Parts Washers, all persons shall maintain records that include the following for each purchase:

1) The name and address of the solvent supplier,
2) The date of the purchase,
3) The type of the solvent, and
4) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

d. **SO_2**

Emission Unit U4

i. For Boiler #1 and Boiler #2, the owner or operator shall operate and maintain a continuous emission monitoring systems (CEMs) for measuring SO_2 concentrations and carbon dioxide (CO_2) concentrations and shall record the output of the systems. The SO_2 and carbon dioxide concentrations shall both be monitored at the inlet and outlet of the SO_2 control device.

1) The owner or operator of an affected facility shall obtain emission data for at least 75 percent of the operating hours in at least 22 out of 30 successive boiler operating days. If this

minimum data requirement is not met with a single monitoring system, the owner or operator of the affected facility shall supplement the emission data with data collected with other monitoring systems as approved by the Administrator or the reference methods and procedures as described in 40 CFR 60.47b.

2) The 1-hour average sulfur dioxide emission rates measured by the CEMS required by paragraph (a) of this section and required under 40 CFR 60.13(h) is expressed in ng/J or lb/million Btu heat input and is used to calculate the average emission rates under 40 CFR 60.42b. Each 1-hour average sulfur dioxide emission rate must be based on more than 30 minutes of steam generating unit operation and include at least 2 data points with each representing a 15-minute period. Hourly sulfur dioxide emission rates are not calculated if the affected facility is operated less than 30 minutes in a 1-hour period and are not counted toward determination of a steam generating unit operating day.

3) The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the CEMS. (60.47b(e))

4) All CEMS shall be operated in accordance with the applicable procedures under Performance Specifications 1, 2, and 3 (appendix B of 40 CFR Part 60).

5) Quarterly accuracy determinations and daily calibration drift tests shall be performed in accordance with Procedure 1 (appendix F of 40 CFR Part 60).

6) For affected facilities combusting coal or oil, alone or in combination with other fuels, the span value of the sulfur dioxide CEMS at the inlet to the sulfur dioxide control device is 125 percent of the maximum estimated hourly potential sulfur dioxide emissions of the fuel combusted, and the span value of the CEMS at the outlet to the sulfur dioxide control device is 50 percent of the maximum estimated hourly potential sulfur dioxide emissions of the fuel combusted.

ii. For Boiler #4, the monitoring requirements of 60.46c(a) and (d) do not apply where the owner or operator seeks to demonstrate compliance with the SO_2 standards based on fuel supplier certification, as described under 60.48c(f)(1), (2), or (3), as applicable.

iii. The owner or operator shall maintain the following coal supplier certification records.

1) The name of the coal supplier; and

2) The percent sulfur content of the coal.

e. **NO_x**

Emission Unit U4

i. For Boiler #1 and Boiler #2, the owner or operator shall maintain and operate a continuous monitoring system, and record the output of the system, for measuring nitrogen oxides emissions discharged to the atmosphere. See Appendix A of this permit for compliance monitoring and testing requirements for NO_x.

1) The continuous monitoring systems shall be operated and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments.

2) The 1-hour average nitrogen oxides emission rates measured by the continuous nitrogen oxides monitor required by shall be expressed in ng/J or lb/million Btu heat input and shall be used to calculate the average emission rates under 40 CFR 60.44b. The 1-hour averages shall be calculated using the data points required under 40 CFR 60.13(b). At least 2 data points must be used to calculate each 1-hour average.

3) The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring systems.

4) When nitrogen oxides emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7, Method 7a, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

ii. For Boiler #3 and Boiler #4, when combusting either natural gas or fuel oil, the owner or operator submitted a one-time compliance demonstration dated March 10, 2004 showing that the potential NO_x emissions do not exceed the standards in Additional Conditions 1.a.iv., 1.a.v., and 1.a.vi. Therefore, there are no NO_x compliance monitoring, recordkeeping, or reporting requirements for these boilers.

iii. For Boiler #3 and Boiler #4, when combusting either natural gas or fuel oil,

1) The owner or operator shall keep records of the amount of fuel combusted during each month. (40 CFR 60.48c(g) as modified by EPA letter dated March 7, 2002) (See Comment 12)

2) The owner or operator shall keep a monthly record of the hours of operation for each boiler. (40 CFR 60.48c(g) as modified by EPA letter dated March 7, 2002) (See Comment 12)

3) The owner or operator shall monthly calculate the prorated fuel usage of the boiler by correlating the design heat input capacity of all natural gas fired units at the plant. (40 CFR 60.48c(g) and EPA Letter dated March 7, 2002)(See Comment 12)

f. **CO**

Emission Unit U4

i. For Boiler #1 and Boiler #2, when combusting coal, and Boiler #4, when combusting fuel oil, the owner or operator submitted a one-time compliance demonstration on March 10, 2004, showing that the potential CO emissions do not exceed the standards. Therefore, there are no CO compliance monitoring, recordkeeping, or reporting requirements for these boilers.

ii. For Boiler #3 and Boiler #4, when combusting natural gas, the owner or operator submitted performance test results on April 30, 2004, showing that the CO emissions do not exceed the standards. Therefore, there are no CO compliance monitoring, recordkeeping, or reporting requirements for these boilers.

g. **Lead (Pb)**

Emission Unit U4

The source submitted a one-time compliance demonstration dated August 31, 2000, that demonstrates that the emissions of lead (Pb) can not exceed the allowable emission limits; therefore, there are no monitoring, record keeping, and reporting requirements for lead.

h. **Sulfuric Acid (H_2SO_4)**

Emission Unit U4

For Boiler #1 and Boiler #2, when combusting coal, and Boiler #4, when combusting fuel oil, the District has determined that the SO_2 compliance monitoring requirements in Additional Condition 2.b. are sufficient to assure H_2SO_4 compliance per the PSD Final Determination dated October 24, 1990. When combusting natural gas in Boiler #3 and/or Boiler #4, there are no H_2SO_4 standards, monitoring, recordkeeping, or reporting.

i. **TAP**

Emission Unit U1/U2 and U3

i. For Emission Point (Railcar Loading) (when not operated as a Closed System and being vented to the Flare Thermal Oxidizer (C-FLARE TO) and/or the existing Flare Control System (C-FLARE)): See Additional Condition 3.e.i.

ii. For all Emission Points subject to Regulation 5.11 or 5.12 that emit the THF (tetrahydrofuran) TAP, the owner or operator submitted a THF TAP One-Time Compliance Demonstration on July 1, 2004, as part of the Flare Thermal Oxidizer Construction Permit Application, that showed the potential, uncontrolled, TAP emissions (without consideration of the Flare Thermal Oxidizer (C-FLARE TO)) cannot exceed the ASL. The owner or operator also had, on July 25, 2003, submitted a THF TAP One-Time Compliance Demonstration that showed the potential, uncontrolled, TAP emissions (without consideration of the Flare Control System (C-FLARE)) cannot exceed the ASL. Therefore, the potential, uncontrolled, TAP emissions (without consideration of C-FLARE TO and/or C-FLARE)) cannot exceed the ASL. There are thus no TAP compliance monitoring requirements for these Emission Points.

iii. For all Emission Points subject to Regulation 5.11 or 5.12 that are closed system, there are no TAP compliance monitoring requirements for these Emission Points.

Emission Unit U4

i. For Emission Point (Truck Lime Unloading), this Emission Point is a closed system and there are no TAP requirements for Regulation 5.12.

ii. For Emission Point (Ash Handling System, Ash Load-Out System, and Lime Handling System), the owner or operator shall utilize TAP BACT for the particulate TAPs. The District has determined that the fabric filters (C-U4-ASHSILO, C-U4-ASHLOAD, and C-U4-LIMESILO) are each considered TAP BACT for the particulate TAPs. (Regulation 5.12, section 1)

j. **Reporting**

The following is a summary of the report periods and due dates for the reports required:

Report Description	**Report Period**	**Due Date**
1st Semiannual for Title V	January 1 through June 30	August 29
2nd Semiannual for Title V	July 1 through December 31	March 1[1]
1st Semiannual for non-LDAR	November 16 through May 15	July 14
2nd Semiannual for non-LDAR	May 16 through November 15	January 14
1st Semiannual for LDAR	January 1 through June 30	August 29
2nd Semiannual for LDAR	July 1 through December 31	March 1[1]
1st Quarter for BD/HAP/VOC	January 1 through March 31	April 30
2nd Quarter for BD/HAP/VOC	April 1 through June 30	July 30
3rd Quarter for BD/HAP/VOC	July 1 through September 30	October 30
4th Quarter for BD/HAP/VOC	October 1 through December 31	January 30
1st Semiannual for CEMS	January 1 through June 30	July 30
2nd Semiannual for CEMS	July 1 through December 31	January 30
1st Semiannual for NO_x RACT	January 1 through June 30	August 29
2nd Semiannual for NO_x RACT	July 1 through December 31	March 1[1]
Annual for gasoline	January through December	January 15

Notes:
[1] The date for leap years is February 29.

6. Off-Permit Documents:

A Risk Management Plan submitted on June 18, 2004

Rule Effectiveness Plan approved by the District on March 31, 1995
PSD Final Determination Document dated October 24, 1990
One-Time Demonstrations dated July 25, 2003

The District considers an "off-permit document" as a document on which a source's compliance with given regulation(s) is contingent or which contains regulatory requirement(s), but is only referenced in a source's Title V Operating Permit. The designation "off-permit document" shall be made at the District's discretion, and may include, but not be limited to, documents such as Regulation 1.05 VOC compliance plans, PMPs, MOCS; or other documents which are too voluminous to be included in a source's Title V Operating Permit, as determined by the District.

III. Other Requirements

1. Temporary Facilities: The source did not request to operate any temporary facilities.

2. Short Term Activities: The source did not report any short term activities.

3. Compliance Schedule/Progress Reports: The source has certified compliance with all applicable requirements; therefore, no compliance schedule or progress reports are necessary.

4. Emissions Trading: The source does participate in emissions trading, and has an existing Emissions Bank credit of 654.82 tpy for VOC.

5. Acid Rain Requirements: The source is not subject to the Acid Rain Program.

6. Stratospheric Ozone Protection Requirements: Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.

7. Prevention of Accidental Releases 112(r): The source does manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount. The required Risk Management Plan was submitted on June 18, 2004.

8. Insignificant Activities: The following activities, as referenced in the source's Title V Permit Application, have been determined by the District to be insignificant.

Insignificant Activities		
Description	**Quantity**	**Basis**
Source-Wide Associated Insignificant Activities		
Internal combustion engines fixed or mobile and vehicles used for transport of passengers or freight	various	Regulation 2.02, section 2.2
Brazing, soldering, or welding equipment	various	Regulation 2.02, section 2.3.4
Woodworking, not including conveying, hogging or burning of saw dust or wood waste	various	Regulation 2.02, section 2.3.5
Emergency relief vents, stacks, and ventilating systems (not otherwise regulated)	various	Regulation 2.02, section 2.3.10
Lab ventilating and exhausting systems for nonradioactive materials	various	Regulation 2.02, section 2.3.11
Laboratories	10	Regulation 2.02, section 2.3.11
Blast Cleaning (using a suspension of Abrasive in Water)	various	Regulation 2.02, section 2.3.13
Maintenance Sand Blasting	various	EPA White Papers
Soil or Groundwater remediation - Passive or total removal	various	Regulation 2.02, section 2.3.20
Portable Diesel or Gasoline Storage Tank <500 gal capacity	1	Regulations 2.02, section 2.3.23
Maintenance Painting	various	EPA White Papers
Machine Shop Maintenance Lathes	various	No Known Regulated Emissions
Diesel Fuel Oil Storage Tanks	12	Regulations 2.02, section 2.3.9.2
Emergency Power Generators and Internal Tanks	4	EPA White Papers
Plant Refrigeration System, excluding Receivers (3), but including associated chilled water tanks, compressors, condensers, piping, and heat exchangers	1	Closed system
Truck/Railcar Loading/Unloading of non-regulated materials	various	No Known Regulated Emissions

Insignificant Activities		
Description	**Quantity**	**Basis**
Catalyst Suppressant Storage Tank (1) and Truck Loading/Unloading (2)	1	No Known Regulated Emissions
Liquid Nitrogen Storage Tank	1	No Known Regulated Emissions
Nitrogen Generator	1	No Known Regulated Emissions
Water Tanks, including chilled water tanks	various	No Known Regulated Emissions
PMHP Underground Tanks (empty)	2	No Known Regulated Emissions
Cooling Towers, non-chromium treated water	6	Regulation 40 CFR 63 Subpart Q (63.400)
Air Conditioner Units (<50 lbs of refrigerant)	various	40 CFR 82.166
Wastewater Treatment Plant Caustic Solution Tank (D-202) and associated truck loading/unloading	1	No Known Regulated Emissions
Wastewater Treatment Plant, including spill containment areas	1	No Known Regulated Emissions
Fire Water Reservoir	1	No Known Regulated Emissions
Pre-Landfill Non-Hazardous Waste De-watering Pad	1	No Known Regulated Emissions
Concrete and other debris material storage area	1	No Known Regulated Emissions
Air Compressors	various	No Known Regulated Emissions
Electrical Transformer Coolants (non-PCB)	various	No Known Regulated Emissions
Hydraulic Oil Systems	various	No Known Regulated Emissions (Closed systems)
Gas Chromatographs and associated validation tanks/cylinder standards	various	No Known Regulated Emissions

Insignificant Activities		
Description	**Quantity**	**Basis**
Miscellaneous Drums and Totes, including Hazardous Waste Storage Areas, and Oiler's Assorted Drums of Oil	various	Regulation 2.02, section 2.3.24
Emission Unit U1/U2 Associated Insignificant Activities		
Butadiene Spheres (North Butadiene Sphere and South Butadiene Sphere)	2	Regulation 2.02, section 2.3.26
Butadiene Day Tanks (Day Tanks 7 through 16)	10	Regulation 2.02, section 2.3.26
Chemical Addition Tanks of non-regulated materials and associated truck/railcar loading/unloading	various	No Known Regulated Emissions
Jupite Tank (T-6)	1	No Known Regulated Emissions
Calcium Chloride Tank (T-7)	1	No Known Regulated Emissions
Overhead Accumulator and column system (D-70 and C-11)	1	No Known Regulated Emissions (Closed system)
Finishing Building Anti-Stick Agents Usage	various	No Known Regulated Emissions
Finishing Building Caustic Solution Tank (D-36) and associated truck loading/unloading	1	No Known Regulated Emissions
Water Tanks, including East Hot Water Tank (T-8M), West Hot Water Tank (T-8), Separate System Hot Water Tank (T-8T), and associated skimmer tanks (T-7M, T-7, and T-7T)	various	No Known Regulated Emissions
Wastewater solids settling pits (HC Wastewater Pit and Fines Pit)	2	No Known Regulated Emissions
Finished Off-Spec Rubber Product Reclaim Areas	various	No Known Regulated Emissions
Emergency Relief Vents, Stacks, and Ventilating Systems (not otherwise regulated)	various	Regulation 2.02, section 2.3.10
Miscellaneous Drums and Totes	various	Regulation 2.02, section 2.3.24
Emission Unit U3 Associated Insignificant Activities		

Insignificant Activities		
Description	**Quantity**	**Basis**
Chemical Addition Tanks of non-regulated materials and associated truck loading/unloading	various	No Known Regulated Emissions
Water Tanks	various	No Known Regulated Emissions
Soap Tanks (T-72, T-73, and D-135L)	3	No Known Regulated Emissions
Condensate Receivers (D-1L and D-2L)	2	No Known Regulated Emissions (Closed system)
Five (5) Hold Tanks (HT-1 through HT-5) and Knock-out Tank (KOT) (Non-regulated materials)	6	No Known Regulated Emissions
Thirteen (13) Blend Tanks (BT-1 through BT-13) and Knock-out Tank (D-76L) (Non-regulated materials)	14	No Known Regulated Emissions
Bio-Reactor Caustic Solution Tank (D-80L) and associated truck loading/unloading	1	No Known Regulated Emissions
LP Wastewater Pre-Treatment System, including two (2) Bio-Reactors	1	No Known Regulated Emissions
LP Brine Storage Tank (D-65L) and associated truck loading/unloading	1	No Known Regulated Emissions
Emergency Relief Vents, Stacks, and Ventilating Systems (not otherwise regulated)	various	Regulation 2.02, section 2.3.10
Miscellaneous Drums and Totes	various	Regulation 2.02, section 2.3.24
Emission Unit U4 Associated Insignificant Activities		
Chemical Addition Tanks of non-regulated materials and associated truck loading/unloading	various	No Known Regulated Emissions
Power House Caustic Solution Tank and associated truck loading/unloading	1	No Known Regulated Emissions
Steam Turbine	1	No Known Regulated Emissions
Boiler Water Chemical Treatment (Storage and truck loading/unloading)	various	No Known Regulated Emissions

Insignificant Activities		
Description	**Quantity**	**Basis**
Water Tanks	various	No Known Regulated Emissions
Lime Handling System Liquid Lime Tanks	2	No Known Regulated Emissions
Power House Brine Storage Tank and associated truck loading/unloading	1	No Known Regulated Emissions
Fuel Oil Storage Tanks (East and West) (Both submerged fill)	2	Regulation 2.02, section 2.3.9.2
Emergency Relief Vents, Stacks, and Ventilating Systems (not otherwise regulated)	various	Regulation 2.02, section 2.3.10
Miscellaneous Drums and Totes	various	Regulation 2.02, section 2.3.24
Emission Unit UMSC Associated Insignificant Activities		
Emergency Relief Vents, Stacks, and Ventilating Systems (not otherwise regulated)	various	Regulation 2.02, section 2.3.10
Miscellaneous Drums and Totes	various	Regulation 2.02, section 2.3.24

a. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.

b. Activities identified in Regulation 2.02, section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.

   i. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirement which shall include a 20% opacity limit for facilities not otherwise regulated.

   ii. No visible emission surveys or other monitoring shall be required for facilities designated as insignificant activities.

c. The Insignificant Activities table is correct as of the date the permit was proposed for review by the USEPA, Region 4. The company shall submit an updated list of insignificant

activities annually with the Title V compliance certification pursuant to District Regulation 2.16, section 4.3.5.3.6.